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EX PARTE OR LATE FILED

Ex Parte

April 2, 1998

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
Mail Stop Code 1170
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: In the Matter of Administration of the North American Numbering Plan Carrier
Identification Codes (CICs), CC Docket 92-237

Pacific Bell, Southwestern Bell Telephone Company and Nevada Bell (collectively referred to as "SBC") hereby file the attached affidavit of Violetta Diaz, as an ex parte submission in support of BellSouth Corporation's Petition for Clarification with regard to the Order on Reconsideration, Order on Application and Second Further Notice of Proposed Rulemaking and Order, released on October 22, 1997 in the above-captioned proceeding ("Order"). As SBC stated in its Comments in this proceeding, a phased in approach to CIC number conversion is necessary to ensure network integrity. To clarify, SBC is able to complete its conversion of 1AESS and 5EASS switches by July 25, 1998. The problem lies with conversion of the more complex Nortel DMS 100.

In Pacific Bell and Southwestern Bell there are a total of 353 such switches. While it is SBC's intent to convert from permissive to mandatory 7-digit Carrier Access Code (CAC) dialing as expeditiously as possible, the conversion of the Nortel DMS 100 switches cannot be completed properly in less than 35 working days. The remainder of the proposed schedule would be spent in testing to prevent any adverse impact on customers. Our current projection for conversion is an average of six switches daily. To proceed at a more accelerated pace would place the network's capability at risk.

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As Ms. Diaz's attached affidavit demonstrates, the conversion schedule proposed is warranted and shall not unduly delay the conversion process. It is technically infeasible to complete all conversion activity by July 1, 1998 if the intent of the Commission's Order is for July 1, 1998 to be the date after which no three-digit CICs will be accepted. For these reasons, SBC urges the Commission to clarify its Order to state that July 1, 1998 is the date on which the conversion to CIC blocking should begin with the intent that blocking shall end at a later date upon conversion of all switches.

Please feel free to contact me at the telephone number and address stated above should you require any clarification.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew E. Brown". The signature is fluid and cursive, with the first name "Andrew" being more prominent than the last name "Brown".

Attachment

cc: Kris Monteith

AFFIDAVIT OF VIOLETTA DIAZ

COMES NOW, I Violetta Diaz, and under oath attest to the following:

1. My name is Violetta Diaz. I am currently employed by Pacific Bell in the capacity of Technology Engineer in the Switch Planning District. Prior to assuming this job , I served with Pacific Bell in various capacities including DMS 100 Technology Engineer in the Switching Technology Introduction and Support District, responsible for the approval for use of products and services, the review of technical documentation and writing and the provision of switch technical requirements for switch feature development. I also served as DMS 100 Translations Manager providing translations guidelines and technical support on DMS 100 products and services. I have been employed by Pacific Bell in the Network Organization for 26 years .

2. In my capacity as a Technology Engineer, I have assessed the methods and procedures necessary for Pacific Bell to convert from permissive to mandatory 7-digit Carrier Access Code (CAC) dialing. With regard to Nortel DMS 100 switches, this process shall entail a succession of tasks, exclusive of testing, which will take approximately 35 working days. Call through tests will require approximately 14 additional days. In Pacific Bell, there are 202 DMS 100 switches and in Southwestern Bell there are 151 DMS 100 switches which will require conversion.

3. Prior to June 30, 1998, the following activity shall be completed with regard to all of the DMS 100 switches : the inputing of translations in the Standard Pretranslator table (STDPRTCT) for all seven-digit CACs; ensuring that any use of a five-digit CAC in the forwarded- to number for Remote Call Forwarding/Remote Call Forwarding Equal Access (RCF/RCFEA) is changed to a seven digit CAC format and; ensuring that the Equal Access trunk groups (particularly the end-office to tandem routes) are capable of sending and receiving four digit CICs.

4. After this preliminary activity is completed, implementation of the conversion at each of the individual switches can begin . First, the office parameters of the switch software must be changed . While this process alone is not time-consuming, the reloading of central control data in all the Extended Peripheral Modules (XPMs) , including line modules and line concentrating modules, serving line control devices must be performed during low traffic periods. For this reason, this function can only be scheduled during evening/ night shifts. It is also necessary at each switch to delete the translation entries which use the three-digit CIC form. This process entails deleting five-digit CACs from standard pretranslations in end offices.

5. These activities are specified further in the Nortel Product/Service Update, issued October 1997.

6. The purpose of this activity in the proposed time period is to ensure a smooth implementation of the final phase of CIC expansion. Currently, we believe we can convert an average of six DSMS 100 switches per day. To accelerate this process could acerbate the inherent ambiguities which exist between five-digit and seven-digit codes and risk the integrity of the network.

I hereby attest that the information provided by me above is true and correct to the best of my information and belief.


Violetta Diaz

April 1, 1998
Date